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July 30, 2020

**VIA ELECTRONIC AND FIRST CLASS MAIL**  
**([rogers.rick@epa.gov](mailto:rogers.rick@epa.gov))**

Richard A. Rogers  
Chief, Water Branch  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: *CWA Section 308 Information Requirement*  
*Horizon Land Management, LLC*

Dear Mr. Rogers:

Our firm represents Horizon Land Management, LLC (“Horizon”) in connection with certain environmental matters, including with respect to the referenced Clean Water Act Section 308 Information Requirement (“IR”). The IR seeks information relating to the Boones Mobile Estate Wastewater Treatment Plant, the Maryland Manor Mobile Home Park Wastewater Treatment Plant and the Patuxent Mobile Estates Wastewater Treatment Plant (collectively, the “Plants”). As set forth below, this letter requests a one-month extension of time to respond to the IR.

The IR seeks information from June 1, 2015 through March 31, 2020 for each Plant. Horizon acquired each of the Plants after June 1, 2015. The Boones Plant was acquired in January 2017; the Maryland Manor Plant was acquired in March 2016; and the Patuxent Plant was acquired in September 2017. Accordingly, it is not yet clear whether Horizon possesses information for each Plant covering the requested time period, but it is reviewing its acquisition files carefully to determine whether it does. That review is not yet complete. In addition, during Horizon’ period of ownership, third-party contractors have been responsible for Plant operations. Horizon has experienced turnover in wastewater treatment contractors on two (2) occasions, and that has complicated the review for responsive information. Finally, certain Horizon personnel who have responsibility for assembling responsive documentation have not been in the office consistently during July, either due to previously scheduled summer vacations or the pandemic. Notwithstanding these practical challenges, Horizon has identified information that preliminarily appears to be responsive to the IR, but more time is needed to review,

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categorize and assemble the information so it can be provided in a complete Section 308 response.

At the present time, Horizon anticipates that it will be able to submit a complete response with supporting documentation in electronic format by Monday, August 31. If a significant partial response can be provided sooner, Horizon will make a partial submission and continue to work toward submission of remaining information by August 31. If circumstances arise that have the potential to impact that schedule, we will notify EPA and seek to discuss the matter.

If the agency can please advise if the proposed approach is acceptable, it will be appreciated.

Thank you for your time and consideration and please call if you have questions.

Sincerely,

BOND, SCHOENECK & KING, PLLC

A handwritten signature in dark ink, appearing to read "Robert R. Tyson", with a stylized flourish at the end.

Robert R. Tyson

RRT/ah

cc: Jennie Brancho, EPA (via e-mail) (brancho.jennie@epa.gov)